

## Christopher Fedeli

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**From:** Garn, Jefferson <Jefferson.Garn@atg.in.gov>  
**Sent:** Wednesday, December 04, 2013 5:03 PM  
**To:** Christopher Fedeli  
**Subject:** RE: Judicial Watch and TTV v. King et al., 1:12-cv-00800-WTL-TAB - supplemental production

Chris,

As I mentioned in our call yesterday, given the parameters of your request, we were required to undertake an extensive search for emails of several employees, some of whom are no longer employed by the division. The Indiana Office of Technology has retrieved numerous documents, but we will have to review the documents for privilege and responsiveness. With being out most of next week traveling for this case and ongoing maintenance of other cases, the earliest we will be able to get a second batch to you will be in two weeks, on December 18<sup>th</sup>. Even with the holidays, however, I'd expect to get you the rest of the documents by January 8<sup>th</sup>. As I mentioned, I'll be in touch with you about settlement discussions prior to our deposition and status conference on December 11<sup>th</sup>.

Thanks,

Jeff

**Jefferson Garn**  
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**From:** Christopher Fedeli [<mailto:CFedeli@JUDICIALWATCH.ORG>]  
**Sent:** Tuesday, December 03, 2013 12:46 PM  
**To:** Garn, Jefferson  
**Subject:** RE: Judicial Watch and TTV v. King et al., 1:12-cv-00800-WTL-TAB - supplemental production

Dear Jeff:

It was good speaking with you a few moments ago. As we discussed, I'm sending this email to follow up on the status of the below-referenced production from Indiana in the *JW and TTV v. King et al.* litigation. So far, Plaintiffs have only received documents from two custodians – Leslie Barnes and Dale Simmons. As a reminder, our original Request for Production of these emails has now been outstanding for several months. As detailed further in my October 3, 2013 email to you, Plaintiffs are still awaiting the production of responsive emails from custodians Trent Deckard, Pamela Potesta, Kristi Robertson, Michelle Brzycki, Cody Kendall, J. Bradley King, and Lori Clark.

Please respond to this email to let me know the dates of when I should expect your next rolling production, and when you anticipate the whole production will be complete.

Thank you,  
Chris

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**From:** Garn, Jefferson [<mailto:Jefferson.Garn@atg.in.gov>]  
**Sent:** Wednesday, October 09, 2013 4:42 PM  
**To:** Christopher Fedeli  
**Subject:** Judicial Watch -- supplemental production

Chris,

As discussed earlier this week, I am providing you with supplemental production related to your request for production. The Indiana Office of Technology stores our additional communications, specifically the archived data, and any data from a former employee. But we've managed to retrieve some communication responsive to your request. Of course we maintain our objection to your request as overbroad, vague and unreasonable. If you have any questions, please let me know. Also, I put our unredacted DVD in the mail yesterday, so you should have received that today or will receive it shortly.

I'm sending the documents in separate emails. We've been having problems all day with attachments, so I hope that works.

Best regards,

Jeff

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